## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

Civil	Action	No.	04-11	1625-R	WZ

Joan Charles,	
Plaintiff,	
,	
v.	
**	
Ocwen Federal Bank, FSB;	
Ocwen Financial Corporation;	
Massachusetts Property Insurance	
Underwriting Association;	
and One Call Insurance Agency,	
Incorporated,	
Defendants.	
<del></del>	

## MOTION TO AMEND COMPLAINT

NOW COMES the plaintiff, Joan Charles (hereinafter "Plaintiff") and moves this Honorable Court to allow the amendment of Plaintiff's Complaint.

In support thereof, Plaintiff states that on two separate occasions agents of Defendants Ocwen Federal Bank, FSB, and / or Ocwen Financial Corporation (hereinafter collectively "Ocwen") cut off the padlock securing Plaintiff's property which is the subject property of the instant legal action, and entered her house without her knowledge or permission. Additionally, in a separate incident, an agent of Ocwen contacted Plaintiff in order to gain access to the property. This agent stated that the property had already been foreclosed and that Ocwen now owned the property.

In further support thereof, Plaintiff incorporates the facts alleged in counts XV, XVI, XVII, XVIII and XIX of Plaintiff's Amended Complaint attached hereto, as if expressly restated herein.

Plaintiff contends that the Additional Counts against Ocwen are of such character as to make them part of the same case or controversy as the instant litigation and that no undue prejudice will occur to any party by having such counts incorporated in the instant litigation.

WHEREFORE, moves this Honorable Court to Allow this Motion and Grant leave to amend Plaintiff's Complaint.

Dated: Feb. 8,2005

Respectfully Submitted Plaintiff, by her Attorneys

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